

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Minnesota Deer Farmers Association, et al.,

Civil No. 0:23-cv-03907 JRT/LIB

Plaintiffs,

v.

**MOTION FOR
PRELIMINARY INJUNCTION**

Sarah Strommen, et al.,

Defendants.

To: Philip S. Pulitzer, Assistant Attorney General, 445 Minnesota Street, Suite 1400, St. Paul, Minnesota, 55101:

Please take notice that counsel for the Plaintiffs, Erick G. Kaardal, will move this Court for a preliminary injunctive order under Rule 65 of the Federal Rules of Civil Procedure. The Plaintiffs are entitled to declaratory and injunctive relief as supported by their respective Amended Complaint, memorandum of law, declarations, and exhibits as submitted to this Court.

As set out more fully in the memorandum of law, declarations, exhibits, Plaintiffs claim violations of their federal rights under the Equal Protection Clause, the Due Process Clause, and Takings Clause of the U.S. Constitution. Plaintiffs submit that they meet the standards for a preliminary injunction, including that they have probable success on the merits, they will be irreparably harmed, others will not be substantially harmed, the public interest will be served, and there is no adequate remedy at law.

Because a preliminary injunction presents no monetary risks to the Defendants, Plaintiffs request that no bond be required. Fed. R. Civ. P. 65(c).

Based upon their submissions Plaintiffs pray that the Court grant this motion and preliminarily enjoin the Defendants.

Oral argument is requested on this motion because of the complex legal arguments involved in this case.

Dated: February 23, 2024

/s/Erick Kaardal

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